

**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Michigan

United States of America

v.

Shaila Monaye Luckado

Case: 4:21-mj-30349

Judge: Unassigned

Filed: 07-15-2021 At 03:21 PM

CMP USA V LUCKADO (kcm)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 21, 2021 in the county of Genesee in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922 (n)

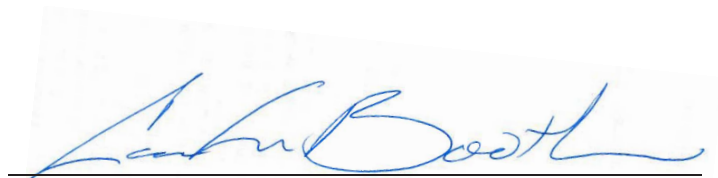
Possession of a firearm while under indictment

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: July 15, 2021City and state: Flint, Michigan

*Complainant's signature*Candace Booth, Special Agent - ATF&E*Printed name and title*

*Judge's signature*Curtis Ivy, Jr., United States Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Candace A. Booth being first duly sworn, hereby depose and state as follows:

***Introduction***

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), currently assigned to the Ann Arbor, Michigan, Field Office. I have been an ATF Special Agent since 2009. I have had extensive training at the Federal Law Enforcement Training Center in the Criminal Investigator Training Program and ATF Special Agent Basic Training. Before working for the ATF, I was a US Border Patrol Agent. I have participated in numerous state and federal investigations including narcotics trafficking, illegal firearms possession, firearms trafficking, shooting investigations, as well as other types of criminal investigations. Because of my involvement in these and other investigations, I have sworn to a number of federal search and arrest warrants.

2. This affidavit is in support of a complaint and arrest warrant for Shaila Monaye LUCKADO (DOB \*\*/\*\*/2001). Because this affidavit is being submitted for the limited purpose of establishing probable cause, I have not included each and every fact known to me concerning this investigation.

3. ATF is currently conducting a criminal investigation concerning Shaila Monaye LUCKADO for violations of 18 U.S.C. § 922 (n) (Possession of a firearm while under indictment).

4. The facts in this affidavit are based on my personal knowledge and observations, my review of law enforcement reports, communications with others who have personal knowledge of the events and circumstances described in this affidavit, and information gained through my training and experience.

***Probable Cause***

5. On June 21, 2021, Michigan State Police Trooper Ager initiated a traffic stop on a Chevrolet Equinox for no registration plate on I-75 near Flint, within the Eastern District of Michigan. The Trooper spoke with the driver, who was identified via his Michigan Identification card. When asked, the driver stated he did not have a valid driver's license and did not have insurance on the vehicle. The Trooper identified the front passenger, Shaila M. LUCKADO (DOB xx/xx/2001), via her Michigan Identification Card. LUCKADO's baby was in a car seat in the second row of seating.

6. A LEIN query showed that LUCKADO had a felony warrant out of 67<sup>th</sup> District Court, Genesee County for Case Number 21T01458 regarding the following charges: Assault With Intent to Murder, Weapons-Felony Firearms , Weapons-Firearms-Discharge from a Vehicle. LUCKADO was placed under arrest for the warrant and placed in the front of the patrol vehicle. The Trooper asked the driver to step out of the vehicle. The Trooper then completed a consent search and inventory search of the vehicle, observing a pink bag on the backseat of the vehicle near the baby carseat. When asked, the driver stated that it was the baby's diaper bag. The driver consented to a search of the pink bag, and the Trooper saw a Glock, model 23, 40 caliber handgun, serial number BMVN440, with a loaded magazine in the diaper bag. The Glock was additionally equipped with a Glock Auto switch, which allows the firearm to fire automatically as a machine gun. The driver was then placed into handcuffs and detained in the backseat of the patrol car until other officers arrived.

7. The Trooper *Mirandized* the driver, who stated he understood his rights and was willing to talk. When asked, the driver denied knowledge of the firearm and asserted that the firearm did not belong to him or LUCKADO. The driver

explained that he just got out of jail and if the firearm was actually his, he would have run from the police like he did during their last encounter.

8. The Trooper *Mirandized* LUCKADO, who stated that she understood her rights and was willing to talk. When asked if the pink bag was her baby's diaper bag, LUCKADO agreed that it was. LUCKADO stated she does not condone guns, but stated it was not the driver's gun because he just got out of jail. LUCKADO explained that they had just left her brother's house with the pink diaper bag and stated that her brothers do carry guns. LUCKADO repeatedly stated "My brothers are dying." LUCKADO admitted to being caught by the police with a firearm in her possession in the past. While in route to the jail, LUCKADO stated that the handgun couldn't be hers because she has a "big, long gun" at home. The Trooper told LUCKADO that he believed she borrowed the gun from her brother to protect her child while they went to pick up the car they were driving. LUCKADO started crying and when asked if the driver got the gun from her brothers, LUCKADO stated "no, no." LUCKADO only became upset when the Trooper asked if the gun was hers. LUCKADO then remarked that the gun wasn't intended for the road trip and then stated, "The gun was in my baby's diaper bag--I mean I didn't know it was in my baby's diaper bag." LUCKADO revealed that they took the bag from inside of her brother's house. LUCKADO reported that she cannot go to jail for the gun because she is on probation and "is doing good." LUCKADO then noted that all her brother's guns are in his name and they are telling her to carry a gun. LUCKADO stated, "Sir we are dying out here." When asked again who the gun belonged to, LUCKADO started crying again and said, "I wasn't even driving though." LUCKADO asked, "Why would you think a girl had a gun in the car and not the guy?" While at the jail, LUCKADO announced that she could not be lodged for the handgun because "she wasn't the driver of the vehicle," and because she, "was a female and they can't go to jail for guns."

9. LUCKADO is currently on pretrial release from the 67th District Court, Genesee County, for Weapons-Carrying Concealed in case number 20T02331 and for the charge of False Pretenses-\$1000 - \$20,000 in case number 21T00485. In both cases, LUCKADO was arraigned on these charges on March 13, 2021, and a bond hearing was held March 25, 2021. She was released on bond with conditions, including “Do Not Possess or Purchase a Firearm or Other Dangerous Weapon.” The cases remain pending without a resolution. The charges in both cases are felonies punishable by a term of imprisonment exceeding one year in jail.

10. On July 15, 2021, I spoke with Special Agent Michael Bolf who is a Firearms Interstate Nexus trained Special Agent. From the information provided, and based on Special Agent Michael Bolf’s training and experience, the above-described Glock firearm was manufactured outside of the state of Michigan, and therefore traveled in or affected interstate or foreign commerce before LUCKADO possessed it. The firearm is also a “firearm” as defined in 18 U.S.C. § 921.

***Conclusion***

11. Based upon the facts stated above, there is probable cause to believe that on June 21, 2021, in the Eastern Judicial District of Michigan, Shaila LUCKADO willfully received a firearm while under indictment for a crime punishable for a term of imprisonment exceeding one year, a firearm having affected interstate commerce, in violation of 18 U.S.C. § 922(n).

Respectfully submitted,



Candace A. Booth  
Special Agent  
Bureau of Alcohol, Tobacco, Firearms,  
and Explosives

Sworn to before me and signed in my presence  
and/or by reliable electronic means on July 15, 2021.



CURTIS IVY, JR.  
UNITED STATES MAGISTRATE JUDGE